

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN, MEMPHIS

Vernon Hayes Watson

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Picadilly Cafeteria  
Jeff Blaylock

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Vernon Hayes Watson  
(name of plaintiff)

is a citizen of the United States and resides at 4690 Millstream Dr. #203  
(street address)

Memphis United States Tennessee  
(city) (country) (state)

38116 901-314-1819 / 901-396-3684  
(zip code) (telephone number)

3. Defendant Jeff Blaylock (Piccadilly Cafeteria)  
(defendant's name)

lives at, or its business is located at 3968 Elvis Presley Blvd, Mphs. Tn.  
(street address)  
38116

4. Plaintiff sought employment from the defendant or was employed by the defendant at  
3968 Elvis Presley Blvd.  
(street address)  
Memphis U.S.A Tennessee 38116  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 04 August 2009  
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about n/a  
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 07 August 2009  
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 26 April 2011. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☐ sex, (4) ☐ religion, (5) ☐ national origin, defendant

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☐ failed to promote plaintiff.

(d) ☒ \_\_\_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows:

In December 2008, I, Vernon Watson filed a discrimination against Piccadilly thru the EEOC. The case was settled thru mediation with me being awarded \$1400.00 back pay. A pay raise to \$8.00 and to keep my employment. On 07-21-09, the police came to Piccadillys and arrested me while both managers were present. I was released 8 days later and returned to work. Jeff Blahlock (general manager) stated that I had been terminated for no-call no show. My employer knew of my whereabouts. I am positive that I was retaliated against for my previous charge of discrimination

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_\_ are still being committed by defendant.
- (b) \_\_\_\_ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_\_ Defendant be directed to employ plaintiff, or
- (b) \_\_\_\_ Defendant be directed to re-employ plaintiff, or
- (c) \_\_\_\_ Defendant be directed to promote plaintiff, or;
- (d) \_\_\_\_ Defendant be directed to compensate plaintiff  
for loss wages & suffering

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ) No ( )

Vernon Watson

SIGNATURE OF PLAINTIFF